

REMARKS

By this amendment, claims 7-14 and 17 are pending. Claim 7 has been amended, and claims 15 and 16 have been canceled, their subject matter now being incorporated into independent claim 7. Claim 17 is newly presented for examination. Applicants respectfully request reconsideration of the above-identified application in view of the above amendments and the following remarks.

Claim 7 has been amended to recite the subject matter of claims 15 and 16, which are now canceled. Support for this amendment is found throughout the Specification and Drawings, as filed, for example at page 9, lines 12-13, page 10, last paragraph, page 5, last paragraph, page 12, lines 6-7.

Claim 7 has been further amended to recite that the printed part “directly” adheres to the first binder layer.... Support for this amendment is found throughout the Specification and Drawings, as filed, for example at page 9, first paragraph, and in Figures 2, 3, 4C, 5A and 5B.

Support for newly presented claim 17 is found throughout the Specification and Drawings, as filed, for example at page 15, lines 9-13.

Claim Rejections under 35 U.S.C. § 102

1. Claims 7, 10-11 and 13-16 have been rejected under 35 U.S.C. § 102(b) as being anticipated by Gordon (U.S. Pat. No. 4,101,701). Applicants respectfully traverse this rejection.

Gordon cannot anticipate amended claims 7, 10-11 and 13-16, because it does not teach each and every element of these claims. See MPEP §2131 (*quoting Verdegaal Bros. v.*

Union Oil Co. of California , 814 F.2d 628, 631 (Fed. Cir. 1987) (“[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference”)).

Gordon describes a lamination configuration and materials therefor. In Gordon, a photograph (specifically, a “Polaroid”) having a support layer 14 and image stratum 12, is inserted in-between a transparent layer 16 and an adhesive layer 18. The Examiner argues that image stratum 12 is analogous to Applicants’ claimed “printed part,” that transparent layer 16 is analogous to Applicants’ claimed second binder layer and that bottom adhesive layer 18 is analogous to Applicants’ claimed “first” binder layer. The Examiner argues that the “printed part [12] [is] formed on the first binder layer [18].” See Office Action, page 3, lines 1-2. However, according to Gordon, this is not the case. Rather, the image stratum 12, is supported by support layer 14. Support layer 14 is in contact with the lower adhesive layer 18, but is it clearly not “formed on” this layer. Much less is the image stratum 12 itself formed on this layer 18, as claimed by Applicants. See Gordon, Figures 2 and 5, for example. Accordingly, Gordon does not teach or suggest “a printed part formed on the first binder layer,” as claimed by Applicants in independent claim 1.

Further, Gordon describes that the image stratum 12 and support layer 14 are preferably a “Polaroid” photograph, which is necessarily created (i.e., “formed”) prior to insertion in the laminate. The well-known “Polaroid” photographic process requires that specific chemicals be released from a compartment within the film sheet to initiate developing. Such a compartment would not be included in a badge ID, so such compartment is removed prior to lamination, if lamination is desired. Regardless of the specific nature of the “print” 10 of Gordon (including layers 12 and 14), it is prepared or “formed” prior to lamination, separate from any of

the laminate layers of Gordon (18, 16, etc.). To this end, Figure 3 of Gordon illustrates a prepared laminate ready to accept a print 10.

Moreover, as amended, Applicants' claim 7 is directed to a printed part that consists entirely of ink, which is in contrast with Gordon's photographic print 10, having stratum 12 and support 14 layers. Applicants' amended claim 7 also recites that the printed part "directly adheres" to the first binder layer and to the second binder layer, which, for the reasons stated above, is not taught or suggested by Gordon.

In light of the foregoing, Applicants respectfully submit that independent claim 7, and all claims depending therefrom, define patentable subject matter over Gordon. Withdrawal of the rejection applied to claims 7, 10-11 and 13-14 under 35 U.S.C. § 102(b) as being anticipated by Gordon, is respectfully requested. Claims 15 and 16 have been cancelled, thus rendering moot the rejection of these claims.

Claim Rejections under 35 U.S.C. § 103

2. Claims 8-9 and 12 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Gordon in view of Keng (U.S. Pat. No. 5,362,540). Applicants respectfully traverse this rejection.

"To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art." MPEP §2143.03 (citing In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)). The deficiencies of Gordon are set forth above. Keng does not remedy these deficiencies. Keng describes a document lamination system including laminating sheets, adhesive, and shielding sheets, such that a document can be sealed within the lamination sheets and later removed undamaged. See Keng, Abstract. Keng

specifically states that the purpose of shield device (16) is "to prevent direct adherence of the sheets 12 and 14 to the document 10." See Keng at column 2, lines 51-54.

As with Gordon, the document 10 of Keng is not "formed on [a] first binder layer," does not "directly adhere to the first binder layer and to the second binder layer," nor does the document "consist entirely of ink" as claimed by Applicants in independent claim 7, as amended. Therefore, neither Gordon, nor Keng, neither alone nor in combination, teaches or suggests these claimed features.

In light of the foregoing, Applicants respectfully submit that independent claim 7, and all claims depending therefrom, define patentable subject matter over Gordon and Keng, considered alone or in combination. Withdrawal of the rejection applied to claims 8-9 and 12 under 35 U.S.C. § 103(a) as being unpatentable over Gordon in view of Keng, is respectfully requested.

CONCLUSION

Based on the foregoing amendments and remarks, Applicants respectfully request reconsideration and withdrawal of the rejection of claims and allowance of this application.

Respectfully submitted,
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